

Amy L. Bennecoff (275805)
Kimmel & Silverman, P.C.
30 East Butler Pike
Ambler, PA 19002
Telephone: 215-540-8888
Facsimile: 215-540-8817
abennecoff@creditlaw.com
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DEMELVIN BATES,)
)
Plaintiff,) Case No.: 2:15-cv-07323-ODW-JPR
v.)
)
BLUESTEM BRANDS, INC. d/b/a) STIPULATION FOR DISMISSAL
FINGERHUT,) OF ACTION WITH PREJUDICE
)
Defendants.)
)
)

TO THE CLERK:

Plaintiff, DEMELVIN BATES (herein after "Plaintiff"), and Defendants,
BLUESTEM BRANDS, INC. d/b/a FINGERHUT (hereinafter "Defendants"), (all
jointly hereinafter referred to as "the Parties") hereby move to dismiss the action
with prejudice, and in support of this Motion hereby say:

1. This matter is resolved between the parties.
2. The Parties to the litigation have now entered into this Joint Motion.
3. Each party will bear its own attorney's fees and costs.

4. The Parties agree that this Court can proceed to dismiss the action with prejudice.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court dismiss this action with prejudice.

/S/ Hunter R. Eley
Hunter R. Eley Esq.
Doll Amir & Eley LLP
1888 Century Park East,
Suite 1850
Los Angeles CA 90067
Phone: (310) 557-9100
Fax: (310) 557-9101
Email:heley@dollamir.com
Attorney for Defendants

Date: May 22, 2017

/S/ Amy L. Bennecoff Ginsburg
Amy L. Bennecoff Ginsburg Esq.
Kimmel & Silverman, P.C.
30 East Butler Pike
Ambler, PA 19002
Phone: (215) 540-8888
Fax: (215) 540-8817
Email: aginsburg@creditlaw.com
Attorney for the Plaintiff

Date: May 22, 2017

Signature Certification

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Hunter R. Eley, counsel for Defendants, and that I have obtained Counsel's authorization to affix his electronic signature to this document.

Dated: May 22, 2017

Kimmel & Silverman, P.C.

/s/ Amy L. Bennecoff Ginsburg
Amy L. Bennecoff Ginsburg Esq.
Attorney for Plaintiff

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have served a copy of the foregoing document by
3 Notice of Electronic Filing on this 22nd day of May, 2017:
4

5 Hunter R. Eley Esq.
6 Doll Amir & Eley LLP
7 1888 Century Park East,
8 Suite 1850
9 Los Angeles CA 90067
Phone: (310) 557-9100
Fax: (310) 557-9101
Email:heley@dollamir.com
10

11

12 DATED: May 22, 2017

/s/ Amy L. Bennecoff Ginsburg
Amy L. Bennecoff Ginsburg Esq.
Attorney for Plaintiff